



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
AIR AND RADIATION

August 26, 2008

Dear Commercial Refrigeration Manufacturer or Other Industry Stakeholder:

The Environmental Protection Agency (EPA) welcomes your input on the attached **Draft 2 ENERGY STAR®** specification for Commercial Refrigerators and Freezers. This Draft 2 specification reflects comments received on the previous Draft 1 document including those discussed at the May 19, 2008 stakeholder meeting.

One of the key items discussed during the stakeholder meeting was the consistency of the data used in EPA's analysis. While some manufacturers were testing units with all accessories enabled, other manufacturers were not, resulting in inconsistent reporting. It was discussed during the meeting that EPA should use data from the Natural Resources Canada (NRCAN) product database, which requires that products be tested with all optional accessories turned to the "ON" position. In preparation of this Draft 2 specification, EPA used the NRCAN product database, as well as some additional data submitted by manufacturers for units that were tested in a consistent manner. The new proposed performance levels are presented in Section 3: Energy Efficiency Specifications for Qualifying Products (Table 1). Other revisions to Table 1 include:

- Volume categories have been further broken out for vertically configured solid and glass door refrigerators and freezers and
- Chest configured solid and glass door cabinets are broken out with a separate energy consumption requirement for refrigerators and freezers.

Stakeholders will also notice the following key changes in this latest version:

- Due to limited data and interest from stakeholders, ice cream freezers and dual temperature (refrigerator/freezer) units are excluded from the specification.
- References to ANSI/NSF International Standard for Food Equipment – Commercial Refrigerators and Freezers (ANSI/NSF 7-2007) and UL Standard for Commercial Refrigerators and Freezers (UL-471) Standards have been added to Section 2: Qualifying Products to further delineate commercial food-grade equipment, which is eligible for ENERGY STAR under this specification, from laboratory-grade equipment, which is not. In order to qualify for ENERGY STAR, models must also meet these quality and safety standards.
- Drawer units are excluded due to the fact that the ASHRAE 72-2005 test procedure is not currently applicable to these units.

- Prep tables and open air units are explicitly excluded in Section 2: Qualifying Products.
- The specification explicitly lists the subcategories of commercial refrigeration products, i.e., undercounter units, milk coolers, back bar coolers, bottle coolers, glass frosters, deep well units, beer-dispensing or direct drawer units, and bunker freezers, eligible for ENERGY STAR as long as these units meet both the definitions in Section 1 and applicable energy consumption requirements in Table 1, depending on configuration, door-type, and volume.
- The proposed effective date for the new Version 2.0 specification has been adjusted to September 1, 2009.

More details regarding EPA's rationale for making these changes are included in note boxes throughout the document.

Stakeholders are encouraged to provide written comments for EPA consideration to Bijit Kundu, ICF International, at bkundu@icfi.com by **September 23, 2008**. All comments will be posted to the ENERGY STAR Product Development Web site unless the submitter requests that their comments remain confidential. If you support the Draft 2 specification, please state this in writing or via email. It is equally important that EPA understand which portions of the draft specification meet with stakeholder approval, in addition to identifying the sections that may need further revision.

To track EPA's progress in revising the ENERGY STAR commercial refrigerator and freezer specification, visit the Product Development Web site at www.energystar.gov/productdevelopment and click on "New Specifications in Development".

Thank you for taking the time to review this draft specification. I look forward to working with you over the next few months. Please feel free to contact me directly with any questions or concerns at (202) 343-9124 or via e-mail at schmeltz.rachel@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Rachel Schmeltz". The signature is fluid and cursive, with the first name "Rachel" and last name "Schmeltz" clearly distinguishable.

Rachel Schmeltz
ENERGY STAR Product Development